

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No. 24-24228-CIV-ALTONAGA

MEGAN PETE, an individual

*Plaintiff,*

v.

MILAGRO ELIZABETH COOPER,  
an individual,

*Defendant.*

/

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION TO REINSTATE JURY VERDICT**

Comes now, the Defendant, Milagro Elizabeth Cooper, by and through undesigned counsel, and files this unopposed motion for extension of time to respond to Plaintiff's motion to reinstate the jury verdict, [Dkt. 257] and in support thereof states the following:

1. On December 23, 2025, Plaintiff filed her Motion to Reinstate Jury Verdict as to Defamation Claim and to Amend Final Judgment or Renewed Motion for Judgment as a Matter of Law and Incorporated Memorandum of Law. Dkt. 257.
2. Ms. Cooper's response to the Plaintiff's motion is due on January 6, 2026.
3. Ms. Cooper needs additional time to respond to the Plaintiff's motion.
4. Ms. Cooper requests a 15-day extension of time to respond to the Plaintiff's motion.
5. Good cause exists for the requested extension because two of Ms. Cooper's

counsels have recently withdrawn from representing Ms. Cooper and remaining counsel cannot meet the deadline prescribed by the rules.

6. Undersigned has conferred with Plaintiff's counsel, who has no objection to the relief sought.

### **CONCLUSION**

WHEREFORE, Ms. Cooper respectfully requests that this Court grant this Unopposed Motion for Extension of Time to Respond to Plaintiff's Motion to Reinstate Jury Verdict.

### **CERTIFICATE OF CONFERENCE**

Undersigned counsel certifies that he has conferred with counsel for the Plaintiff who has no objection to the relief sought herein.

**Respectfully submitted,**

/s/ Jeremy McLymont, Esq.  
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Attorney for Defendant

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5th day of January 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner

for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: */s/ Jeremy McLymont*  
Jeremy McLymont, Esq.  
Florida Bar No. 1010776